

Premier Lotteries Ireland (PLI) HR Candidate Data Privacy Statement – 19.06.2018

Who we are

Premier Lotteries Ireland DAC (PLI) is the operator of the Irish National Lottery. PLI was awarded a 20-year licence to operate the National Lottery by the Irish Government in February 2014 and commenced operations in November 2014.

PLI uses Camelot Global Services Limited (CGS), a sister company, to manage our digital channels, customer services and IT requirements.

PLI and CGS are based in the same premises at National Lottery, Abbey Street Lower, Dublin 1.

About this data privacy statement

Premier Lotteries Ireland has created this data privacy statement as the controller of candidates' personal data to demonstrate our firm commitment to privacy and to inform candidates about the personal data we collect and process in connection with your job application.

This data privacy statement sets out an explanation of what personal data about you we process, why we process your personal data, with whom your data is shared and a description of your rights with respect to your personal data.

What personal data do we process?

We need to keep and process certain information about you, referred to in this data privacy statement as 'personal data', in order to process your recruitment application, to comply with our legal obligations and, where necessary, to protect our legitimate business interests. We will collect and process this personal data from you during the recruitment process, during our employment relationship and following the termination of our employment relationship.

Personal data is normally obtained directly from you. In certain circumstances, it will, however, be necessary to obtain data from internal third parties, e.g. your line manager, or from external third parties, e.g. references from previous employers etc.

The categories of personal data we process and the lawful bases for doing so are set out in more detail in the appendix to this data privacy statement.

How do we use your personal data?

The personal data we hold and process will be used for the management of your application. We keep it and use it to enable us to process your application effectively, lawfully and appropriately, and to protect your rights and interests. This includes using your personal data to enable us to manage the recruitment process, comply with legal and regulatory obligations, pursue our legitimate interests and protect ourselves in the event of legal proceedings.

The uses we make of each category of your personal data, together with the lawful bases we rely on for those uses are set out in more detail in the appendix to this data privacy statement.

Where there is a need to process your data for a purpose other than those set out in the appendix or otherwise outlined to you, we will inform you of this.

How is your personal data shared?

Some personal data may be disclosed to third parties where we are legally obliged to do so or where our employment contract requires or permits us to do so.

More detailed information on how we share your personal data is set out in the appendix.

Will your personal data be transferred abroad?

We transfer part of your personal data to cloud suppliers located in Ireland or the European Economic Area (EEA) for purposes connected with your employment or the management of the company's business. PLI has GDPR Data Processor Agreements with these cloud suppliers.

PLI usually avoids the transfer of personal data outside of the EEA. Should PLI need to, it will ensure adequate safeguards are in place to ensure the security of your personal data where it is transferred outside of the EEA.

More detailed information on data transfers of your personal data is set out in the appendix.

How long do we keep your personal data?

Any personal data processed about you is retained in accordance with our retention policy.

What happens if you do not provide us with your personal data?

In some cases, you may decline to provide us with your personal data. However, if we believe that we require relevant information to effectively and properly manage your application, we may not be able to process your application if you decline to provide us with that personal data.

Will you be subject to automated decision making or profiling?

You will not be subject to automated decision making or profiling.

What are your rights under data protection law?

You have the following rights under data protection law, although your ability to exercise these rights may be subject to certain conditions and where we are permitted to do so under the terms of our licence to operate the National Lottery.

- **Information Request.** The right to receive a copy of and/or access the personal data that we hold about you, together with other information about our processing of that personal data.
- **Update Data.** The right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update your data such that it is complete.
- **Data Deletion.** The right, in certain circumstances, to request that we erase your personal data.
- **Restrict Processing.** The right, in certain circumstances, to request that we no longer process your personal data for particular purposes.
- **Object to Processing.** The right to object to our use of your personal data or the way in which we process it.
- **Data Portability.** The right, in certain circumstances, to transfer your personal data to another organisation.
- **Review Automated Decisions.** The right to object to automated decision making and/or profiling

- **File a Complaint.** You have the right to complain to the Data Protection Commissioner. You also have the ability to complain to us via our [Subject Access Request](#) link – choose option 'File a Complaint'.

PLI uses a secure system for handling access rights requests, which is provided by a specialist service provider called OneTrust. If you would like to exercise any of these rights, please contact us via our [Subject Access Request](#) link.

Closed circuit (CCTV) monitoring

PLI has closed circuit television cameras located at reception. This is necessary to comply with PLI's obligations under the licence to operate the National Lottery and to protect the security of staff and PLI's property. Access to the recorded material is strictly limited to authorised personnel.

Review

This data privacy statement will be reviewed from time to time to take into account changes in the law and the experience of the data privacy statement in practice.

APPENDIX

Category of data	Elements of data	Purpose for processing and uses of the data	Lawful basis for processing the data	Sharing of personal data
<p>Recruitment related data</p>	<p>Contact details, nationality, curriculum vitae, work and educational history, referee names, interview scores and related documentation etc.</p>	<p>To complete the recruitment process and assess candidate suitability for the role. Nationality may be required to assess work permit requirements.</p> <p>The information is used internally by PLI HR department in accordance with PLI HR policies.</p>	<p>The processing is necessary to enter into a contract with the employee and for our legitimate interests in managing an effective recruitment process in circumstances where such interests are not overridden by the rights and freedoms of employees.</p> <p>If the candidate does not provide the requested data, PLI may be unable to consider the application for employment.</p>	<p>PLI uses Talent Manager platform to manage the recruitment process. PLI has a data-processor agreement with Kala, the company that provides Talent Manager. The data is stored on servers located in Norway and Ireland.</p> <p>Based on the position, your application may be shared with Camelot Global Services Ireland (CGSI) who manages PLI's digital channels, customer services and IT.</p> <p>In case of a complaint, the information may be shared with organisations who provide services to the company such as legal advisors.</p> <p>PLI uses DocuSign to sign employment contracts. DocuSign stores a copy of these contracts outside the EEA. DocuSign uses "Binding corporate rules" as a safeguard to ensure the security of your personal data (see below)</p>

Binding Corporate Rules (BCRs) are legally binding documents designed to allow multinational companies to transfer personal data from the European Economic Area (EEA) to their affiliates located outside of the EEA in compliance with data protection law.

Supplier with whom PLI exchange Personal Data in relation to HR	Link to privacy policy
DocuSign	https://trust.docusign.com/en-us/trust-certifications/data-protection-and-trust-guide/docusigns-commitment-privacy/
Talent manager	http://kalatechnology.com/privacy-policy-2/